

From: Marsh, Karen

Sent: Thursday, April 11, 2019 01:41 PM

To: Vazquez, Natalia; Mia, Marcia

CC: Augustine, Bruce; Hall, Kristen

Subject: RE: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

Thanks. I'll pass information along as guidance to WV.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Vazquez, Natalia

Sent: Thursday, April 11, 2019 9:16 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Augustine, Bruce <augustine.bruce@epa.gov>; Hall, Kristen <hall.kristen@epa.gov>

Subject: RE: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

Hi Karen,

Ex. 5 Deliberative Process (DP)

Natalia Vazquez

Environmental Engineer

Office of Air Enforcement and Compliance Assistance

U.S. EPA Region 3

1650 Arch Street (3AP20)

Philadelphia, PA 19103

215-814-2121

From: Marsh, Karen

Sent: Monday, April 08, 2019 9:27 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>

Subject: FW: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

Marcia and Natalia,

Here's a fun one that hopefully can be a quick turnaround.

Looks like WV is asking me to weigh in on the interpretation of the definition of fugitive emissions component. They found 3 leaks through vents during an inspection. The company is making the claim that vents are not fugitive emissions components.

Ex. 5 Deliberative Process (DP)

Fugitive emissions component means any component that has the potential to emit fugitive emissions of methane or VOC at a compressor station, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, compressors, instruments, covers, and meters. Devices that vent as part of normal operations, such as natural gas-driven pneumatic controllers or natural gas-driven pumps, are not fugitive emissions components, insofar as the natural gas discharged from the device's vent is not considered a fugitive emission. Emissions originating from other than the vent, such as the thief hatch on a controlled storage vessel, would be considered fugitive emissions.

Based on my reading of the below email exchange, it looks like WV and the facility disagree on how the emissions from the vent should be treated. WV believes these emissions are the result of a leak past a closed valve (which would be a fugitive emission), while the facility believes any emissions from a vent are exempt.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Given this is in Region 3 and more enforcement related, I'd hoping you can weigh in on how we would want to respond.

Thanks!

Karen

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Jarrett, James F <James.F.Jarrett@wv.gov>

Sent: Thursday, April 04, 2019 6:00 PM

To: Bauerle, Dan C <Dan.C.Bauerle@wv.gov>

Cc: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: Re: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

Dan, thinking about this further if the vent is from a pressure relief device then a stuck open relief valve is definitely LDAR.

Hope this helps. I look forward to Karen's input.

Sent from my iPhone

On Apr 4, 2019, at 4:07 PM, Bauerle, Dan C <Dan.C.Bauerle@wv.gov> wrote:

Hello Karen.

Please comment.....

Related to several valves leaking methane, (identified during a targeted inspection at a gas transmission facility, which is subject to the fugitive emission monitoring requirements of NSPS Subpart OOOOa) the Company refers per yellow hilite below, I believe incorrectly in this case because the fuel valve is leaking through in it's closed position to a vent line which is not "device(s) that vent as part of normal operation" - as such this valve is a fugitive emission component and must be included in the 'monitoring plan' and addressed as a 'leaker' per the requirements of OOOOa, Fugitive Emission Components.

Thanks.

Regards,

Dan Bauerle, Analyst
West Virginia Dept. of Environmental Protection
Division of Air Quality (DAQ)
Compliance & Enforcement Section
601 57th Street, SE
Charleston, WV 25304
email: dan.c.bauerle@wv.gov
ph: (304) 926-0499 ext. 1078
fax: (304) 926-0479

From: Shrishti Chhabra <shrishti_chhabra@transcanada.com>
Sent: Thursday, April 4, 2019 3:17 PM
To: Jarrett, James F <James.F.Jarrett@wv.gov>; Bauerle, Dan C <Dan.C.Bauerle@wv.gov>
Cc: Scott Cunningham <scott_cunningham@transcanada.com>; Nicholas Williams <nicholas_williams@transcanada.com>; Jon Adamson <jon_adamson@transcanada.com>; Timothy Chenoweth <timothy_chenoweth@transcanada.com>
Subject: RE: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

Dan/James,

Thank you for the referenced email you sent Nick.

With regards to the fuel valve leak on the Cooper engine and the 2 vent pipe leaks at Files Creek Compressor Station that were captured by the OGI camera during WVDEP's visit to the facility on 4/2, it is TransCanada's understanding that vents are not components and were not intended to be part of Subpart 0000a.

The definition of a Fugitive Emission Component as defined by the rule is as follows:

Any component that has the potential to emit fugitive emissions of methane or VOC at a compressor station, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, compressors, instruments, covers, and meters. Devices that vent as part of normal operations, such as natural gas-driven pneumatic controllers or natural gas-driven pumps, are not fugitive emissions components, insofar as the natural gas discharged from the device's vent is not considered a fugitive emission. Emissions originating from other than the vent, such as the thief hatch on a controlled storage vessel, would be considered fugitive emissions.

Hence, the referenced leaks are not subject to NSPS Subpart 0000a.

If you have any questions, please let me know and I will respond as soon as I can. Kindly note that I will be out of the country on vacation until April 21.

Thank you,

Shrishti

From: Nicholas Williams

Sent: Thursday, April 4, 2019 12:23 PM

To: Jarrett, James F <James.F.Jarrett@wv.gov>; Bauerle, Dan C <Dan.C.Bauerle@wv.gov>

Cc: Timothy Chenoweth <timothy_chenoweth@transcanada.com>; Dennis Sapp <dennis_sapp@transcanada.com>; Shrishti Chhabra <shrishti_chhabra@transcanada.com>; Scott Cunningham <scott_cunningham@transcanada.com>; Kathy Barger <kathy_barger@transcanada.com>

Subject: RE: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

James, thank you. How would you like us to proceed with this?

From: Jarrett, James F [mailto:James.F.Jarrett@wv.gov]

Sent: Thursday, April 4, 2019 12:46 PM

To: Nicholas Williams <nicholas_williams@transcanada.com>; Bauerle, Dan C <Dan.C.Bauerle@wv.gov>

Subject: [EXTERNAL] RE: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled...

Attached is the optical gas imaging video of the Cooper engine fuel valve leaking through the vent pipe (#8). 2 other vent pipes in the video are also showing emissions (leaks not accounted for in 0000a survey?)

From: Nicholas Williams <nicholas_williams@transcanada.com>

Sent: Wednesday, April 3, 2019 2:28 PM

To: Bauerle, Dan C <Dan.C.Bauerle@wv.gov>

Cc: Jarrett, James F <James.F.Jarrett@wv.gov>

Subject: RE: WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled att...

Dan,

I have received your note and we are evaluating this situation. I am going to on vacation from 4/5-4/10 and will get you an answer as soon as possible.

Thanks and have a good day.

Nick

From: Bauerle, Dan C [mailto:Dan.C.Bauerle@wv.gov]

Sent: Wednesday, April 3, 2019 12:09 PM

To: Nicholas Williams <nicholas_williams@transcanada.com>

Cc: Jarrett, James F <James.F.Jarrett@wv.gov>

Subject: [EXTERNAL] WV Division of Air Quality, re: Yesterday's Question : For the purposes of a Major Source boundary is the equipment on the north side of Files Creek Road included ** per the 70.2 Major Source Definition as (1) (i)?? (ref red encircled att...

Hell Nick.

Please comment on above 'Subject Question'. (Encircled in red references attached.)

Thanks.

Sincerely,

Dan Bauerle - DAQ

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